JOHN SPELLMAN
Governor

DONALD W. MOOS
Director

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
4350-150th Ave. N.E. • Redmond, Washington 98052 • (206) 885-1900

February 22, 1984

Mr. John Lavillette,
Plant Industrial Engineer
Jorgensen Steel Company
8531 E. Marginal Way South
Seattle, Washington 98108

RCRA/Dangerous Waste (WAC 173-303) Inspection
at Jorgensen Steel Co. Facility (WAD000602813) Gen.
Seattle, Washington, on November 8, 1983

Dear Mr. Lavillette:

Thank you for your time and cooperation during my reinspection of the Jorgensen Steel Co. facility in Seattle on November 8, 1983. I have enclosed a copy of the report that I filed regarding that reinspection. Please read the report carefully and implement procedures to bring the facility into compliance with Washington State's Dangerous Waste Regulations (WAC 173-303).

I observed the following points of noncompliance during my reinspection of the facility:

1) Lack of a formal container inspection and maintenance log (as required under WAC 173-303-200 and -630(6)),

2) Inadequate compliance with the Preparedness and Prevention requirements under WAC 173-303-200 and -340 (refer to page II-3 of the enclosed inspection report),

3) Inadequate compliance with the Contingency Plan requirements under WAC 173-303-200 and -350 (refer to page II-5 of the enclosed inspection report), and

4) Lack of both a formal personnel training program and written training plan which insure compliance with RCRA and WAC 173-303 (as required under WAC 173-303-200 and -330).

Results of the following laboratory analysis:

1) pH

2) Specific Conductance

3) Total values for Cadmium, Chromium, Nickel, Zinc, Copper, Iron, Lead, and Selenium

4) Hardness (as $CaCO_3$)

5) EP Toxicity (for the eight metals specified by the EP Toxicity test methods)

On the following samples:

1) Representative samples from the acid etch tanks (including samples of any bottom sludges)

2) Representative samples of any standing liquids at the bottom of the pit

3) Representative samples of any sludges at the bottom of the pit

4) Representative core samples collected to a six-inch depth below the bottom of the pit (if there are no standing liquids and/or no sludges at the bottom of the pit).

Please also provide a physical description of the pit, including an estimate of the amount of limestone in the pit, and including photographs, if possible. Review by this office of these specified data, including the physical description, will determine the need for further sampling and possible ground water monitoring at your facility.

Please do not hesitate to contact me at (206) 885-1900 if you have questions regarding the requirements outlined above. Thank you again for your time and cooperation in this matter.

Sincerely,

Julie Sellick

Julie Sellick
Hazardous Waste Inspector
Environmental Quality

JS:jl
Encl. (1)
cc: Tom Cook, WDOE Headquarters
Pat Lee, WDOE Headquarters
George Hofer, EPA Region 10

RCRA/WAC 173-303 DANGEROUS WASTE

COMPLIANCE CHECKLIST/QUESTIONNAIRE

Industry name and address:

Jorgensen Steel
8531 Marginal Way South
Seattle, Washington

Date: November 8, 1983

EPA/State Identification Number:

WAD000602813

County: King Zip: 98108 Telephone: (206) 762-1100

Physical Location of Facility (if different than above):

Facility Contact(s) Present During Inspection		
Name	Title	Phone No.
John Lavillette	Plant Industrial Engineer	(206) 762-1100
T. Allen Moren	Manager, Purchases	(206) 762-1100
Edmund Wood	Attorney	(206) 625-0714

Inspected by:

Julie Selleck (WDOE), Barbara Smith (WDOE) (206) 885-1900
(Printed) (Phone Number)

I. Notification, Part A and Core Information

1. Notification filed: Yes Date: July 15, 1980
2. Part A application filed: No Date:
3. Classified as:

Generator	✓	Disposal facility	
Transporter		Transfer facility	
Treatment facility		Recycler	
Storage facility		Other	

Comments: This inspection was a follow-up to the inspection conducted on April 12, 1983, in order to review compliance progress at the Jorgensen Steel facility.

4. Have any changes in Notification or Part A been filed? No Date(s): _____

5. Does facility generate a solid waste(s) or receive a solid waste as defined by WAC 173-303-040? Generates

6. Is this waste(s) designated under WAC 173-303, and not RCRA? Under both

7. Under what section, in WAC 173-303, are waste(s) designated?

a.	Discarded Chemical Products (081)	
b.	Dangerous Waste Sources (082)	✓
c.	Dangerous Waste Mixtures (084)	
d.	Toxic Dangerous Wastes (101)	
e.	Persistent Dangerous Wastes (102)	
f.	Carcinogenic Dangerous Wastes (103)	
g.	Dangerous Waste Characteristics (090)	
	(1) Ignitability	
	(2) Corrosivity	
	(3) Reactivity	
	(4) EP Toxicity	✓

Remarks: Baghouse dust, pelletized, containing heavy metals; designated as K061 and D007 and D008 :. This facility utilizes scrap metal only in their steel production; they do not utilize any ore in their production processes.

8. Dangerous Wastes listed on Part A application, or for generators, dangerous wastes generated.

	D.W. No.	Amount	Waste Description	Disposal Method
a.	K061	3-4 tons per month	Emission control dust from the primary production of steel in electric furnaces (see "Remarks" under No. 7 above).	Liquid Waste Disposal transports it to CSSI in Arlington, Oregon
b.				
c.				
d.				
e.				
f.				
g.				

9. Have these wastes been analyzed for determination of degree of hazard? Yes

If so, by whom? Residual Management Technology in Madison, Wisconsin.

10. Has facility petitioned, through RCRA 260.22 or WAC 173-303-910(3), to remove designation from a waste? No

If yes, explain:

11. This facility: ☐ Complies ☐ Does not comply with Interim Status Standards. DNA

Comments: This facility installed a rubberized etch tank in 1950. The tank is filled with a muriatic acid solution and is used to etch-test aircraft quality steel pieces (i.e., to show flaws in the steel). They add either muriatic acid or water to this tank as necessary depending on the acid strength desired. They do not dispose of the acid solution in the tank unless the tank needs repair. They utilize this tank very infrequently; the last time they purchased any acid and placed it in the tank was in August of 1982 (six 55-gallon drums of hydrochloric acid and two 55-gallon drums of sulfuric acid).

There is a five foot deep, concrete lined pit filled with limestone associated with this etching process. The pit has been utilized in the past to neutralize spent acid solutions from the etch tank. The pit is currently utilized (since 1982 at least) as a spill contingency for the etch tank; any spillage from the etch tank would automatically drain to the pit. The contents of the pit have not been tested for designation under WAC 173-303-070. The bottom of the pit is not lined with concrete.

Signature of Inspector: Julie A. Selleck February 21, 1984

II. Standards Applicable to GENERATORS of Dangerous Waste - RCRA 262/WAC 173-303-170 to 230

	Yes	No
1. Does generator transport its own waste?		✓
a. Is waste ever given to "outside" contractor?	✓	

EPA/State I.D. No: WAD980836050

(Contractor(s))
Name and address: Liquid Waste Disposal
7155 W. Marginal Way SW
Seattle, Washington
98106

Note: (If facility transports own waste, look at standards applicable to transporters, section III)

2. Is generator following RCRA/WAC 173-303 manifest system?	✓	
a. Is signature of, and date of acceptance by transporter obtained prior to transport?	✓	
b. Does generator retain one copy of manifest in accordance with WAC 173-303-180(3), Manifest Procedures?	✓	
c. Are manifests (signed by the generator, transporter, and designated disposal facility) kept for a minimum of three years (WAC 173-303-210(1))?	✓	
3. Does generator operate a specific area for container handling or storage?	✓	

If yes, describe: An open (unroofed and unbermed) paved area next to their baghouse dust collection unit.

a. Does generator comply with the requirements set forth in WAC 173-303-200 governing on-site waste accumulation:		
(1) Labeling and marking	✓	
(2) Dating	✓	
(3) Inspections (must be done weekly for containers) WAC 173-303-630(8)? (6)		✓

	Yes	No
b. Are incompatible wastes or other materials segregated?	✓	
4. Is entity familiar with Generator Reporting Procedures, (WAC 173-303-220)?	✓	
a. Annual Reports (WAC 173-303-220(1))	✓	
b. Exception Reports (WAC 173-303-220(2))	✓	
c. Spills and Discharges into the Environment (WAC 173-303-145)	✓	
5. Is generator aware of and complying with regulations concerning the preparation of Dangerous Waste for transport?		
a. Packaging: 49 CFR 173, 178, 179, and with requirements of UTC and WSP	✓	
b. Labeling: 49 CFR 172	✓	
c. Marking: 49 CFR 172	✓	
d. Placarding: 49 CFR 172 Subpart F	✓	

NOTE: Containers with $\leq$ 110 gallons of Dangerous Waste must be marked with the following or essentially equivalent, words and information, displayed in accordance with 49 CFR 172.304:

DANGEROUS WASTE - State and Federal Law prohibits improper disposal. If found, contact the nearest police or public safety authority, and the Washington State Department of Ecology or the U.S. Environmental Protection Agency.

Generator's Name and Address

_____

_____

Manifest Document No. _____

ments: No. 3a(3): The containers are inspected on an informal basis only; the management of this facility does not maintain a formal inspection log.

	Yes	No
6. Are any wastes generated at this facility being transported or stored prior to being recycled, reclaimed, or recovered (WAC 173-303-120)?		✓
a. If yes, what are they? _____		
b. Do they exhibit any of the Dangerous Waste characteristics?		
Note: If not, they are regulated.		
7. Does generator store dangerous waste over 90 days for either transport, treatment or disposal?		✓
If yes, what are they? _____		
(if yes, go to IV, Standards for TSD Facilities)		
8. Does generator follow the operating procedures for containers as outlined in WAC 173-303-160, containers?	DNA	
i.e. Triple rinsing, resulting in less than 1% volume or 1 inch product remaining.		
9. Preparedness and Prevention (WAC 173-303-200(6)).		
a. Is an emergency communication system readily available in areas where wastes are stored or handled (WAC 173-303-340)?		✓
b. Are portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment readily available (WAC 173-303-340(1)(c))?		✓*
c. Have arrangements been made with local police, fire departments, and emergency response teams to familiarize them with the facility layout and the properties of the dangerous wastes handled (WAC 173-303-340(4))?		✓

Comments: No. 9: The containers are loaded inside the baghouse to reduce fine dust escape to the environment. A copy of the spill-emergency plan is also posted in the baghouse

No. 9b: * Emergency procedures for fire are documented in the spill-emergency plan. There are fire extinguishers and fire alarm boxes on the site.

	Yes	No
10. Contingency Plan and Emergency Coordinator (WAC 173-303-200(6)).		
a. Does the facility have a Contingency Plan which is designed to minimize the consequences of any unplanned release of Dangerous Waste (WAC 173-303-350)?	✓	
b. Does the facility have an Emergency Coordinator, and if so, their name Plant Industrial Engineer		
c. Is this Emergency Coordinator, or his designee, familiar with the requirements stated in WAC 173-303-360, Emergencies?	✓	
d. Does contingency plan contain a list of all emergency equipment, its location(s), and a brief outline of its capabilities (WAC 173-303-350(3)(e))?		✓
If not, explain: Plan does not contain detailed descriptions of emergency equipment or its capabilities		
11. Personnel Training (RCRA 262.34(a)(5))		
a. Does facility have a training program that instructs facility personnel in such a way that ensures compliance with RCRA and WAC 173-303?		✓
(1) Do facility personnel participate in an annual review of the training provided in the training program?		
(2) Does the program include training in the following areas, where applicable?		
(a) Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment.		
(b) Key parameters for automatic waste feed cut-off systems.		
(c) Communications or alarm systems.		
(d) Response to fire or explosions.		
(e) Response to ground water contamination.		
(f) Shut down of operations.		

	Yes	No
b. Does facility have a written training plan which includes the following documents and records:		
(1) For each position related to dangerous waste management; the job title, job description (including qualifications), and the name of the employee.		✓
(2) A written description of the type and amount of both introductory and continuing training for that position.		✓
(3) Records documenting that facility personnel have received and completed the training required by WAC 173-303-330.		✓

Comments: No. 9: These requirements need to be addressed for both the baghouse area and for the etch tank/lime pit area.

No. 10d: The Emergency Procedure Plan does not contain a list of all emergency equipment, its location(s), or a brief outline of its capabilities. This Plan should address equipment for both the baghouse area and etch tank/lime pit area.

No. 11a: This facility does have a training program for personnel for safety, but they have not geared it to ensure compliance with WAC 173-303.

No. 11b: They do not have a written training plan for personnel involved with dangerous waste handling or management.

Mr. Laville the provided me with a copy of their Emergency Procedure Plan. He agreed to revise the Plan to include procedures for the acid etch tank.